

Responsible Procurement Policy

OVERVIEW

Buildcorp Group considers our responsibility to the community, the environment, our people and our clients. We work in partnership with our suppliers to make procurement decisions that consider more than price and profit alone, but also ethical, environmental, and social factors.

OBJECTIVES

This policy seeks to ensure that the goods and services we purchase through our supply chain:

- ▶ are ethically produced and minimise risk
- ▶ are environmentally viable
- ▶ comply with Australian Standards
- ▶ are free from conflicts of interest
- ▶ are competitively/comparatively sourced
- ▶ deliver value for our business and clients
- ▶ are sourced from a diversified supply chain

CONSIDERATIONS

Environment

In line with our Environment Plan 2022-2030, our procurement decisions aim to prioritise the selection of environmentally sound product and services including:

- ▶ purchasing 100% renewable energy for all Buildcorp owned and leased premises
- ▶ sourcing locally made products where products of equivalent quality and function and cost are available
- ▶ minimizing packaging and transportation where possible
- ▶ eliminate (where possible) the use of single use products, particularly in relation to marketing and promotional activities

Anti-Slavery (Modern Slavery)

Buildcorp believes that all employees and all workers within our supply chain should be free from direct violations of human rights and the law. To achieve this, we:

- ▶ comply with all applicable Australian and international Modern Slavery legislation, including breaches of the Modern Slavery Act 2018 (Cth) and the Modern Slavery Act 2018 (NSW)
- ▶ where appropriate, require suppliers and sub-contractors to complete our Modern Slavery Self-Assessment Questionnaire prior to awarding of contracts
- ▶ reserve the right to audit supply chains at any time, with a particular focus on our areas of high risk and likelihood of Modern Slavery being present
- ▶ never employ children under the legal age of employment

- ▼ never use any form of forced, bonded or involuntary labour
- ▼ comply with all national laws and mandatory industry standards regarding working hours, overtime, wages and benefits, and freedom to association
- ▼ promote an inclusive work environment that values the diversity of its employees
- ▼ maintain high standards of occupational health and safety

Supplier diversity

In line with our Innovate Reconciliation Action Plan 2023-2025 we aim to increase the participation of Indigenous owned businesses within the construction industry, to do this we will:

- ▼ maintain membership of Supply Nation
- ▼ endeavour to a combined minimum 3% spend across all projects and group services where there is an equivalent product offering
- ▼ provide networking opportunities for Indigenous businesses to develop relationships with our key decision makers

MANAGEMENT CONTROLS

Through the implementation of this policy we:

- ▼ endeavour to require all suppliers to acknowledge their adherence to the principles outlined in this policy through signing Buildcorp's Supplier Code of Conduct
- ▼ expect our suppliers and subcontractors comply with all applicable Australian and international laws in relation to prohibited business practices and to support internationally accepted standards, treaties, and declarations
- ▼ periodically review our supply chain to ensure no complicity in money laundering, financing terrorism, violations of human rights, breaches of privacy and data protection obligations, violations of trade and import rules or other prohibited and unethical practices
- ▼ maintain Buildcorp's safety standards by incorporating risk management activities into purchasing processes to prevent new hazards from being introduced into the workplace.

RESPONSIBILITY & ACCOUNTABILITY

| Position | Accountability |
|-----------------------------------|-----------------------------------------------------------------------------|
| Managing Director Buildcorp Group | Oversight and approval of the policy across the group |
| Business Unit General Managers | Implement and maintain policy |
| Employees | Understanding and implementation of policy when making purchasing decisions |

DEFINITIONS

| Term | Definition |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Modern Slavery | Modern slavery describes incidences of human rights abuses including human trafficking, slavery, servitude, forced marriage, forced labour or services, and the worst forms of child labour. |
| Human Rights | Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. |

RELATED POLICIES & DOCUMENTS

- ▼ Modern Slavery Statement
- ▼ Environment Plan 2022-2030
- ▼ Modern Slavery Procedure
- ▼ Responsible Business Conduct Policy
- ▼ Environment Policy
- ▼ Supplier Code of Conduct

APPROVAL & REVIEW

| Position | Role | Date | Next Review |
|-------------------------|----------|-------------|-------------|
| Chief Financial Officer | Owner | 7 July 2025 | June 2026 |
| Managing Director | Approver | 7 July 2025 | |